

MCGUIREWOODS LLP
David C. Powell SBN #129781
dpowell@mcguirewoods.com
Carolee Anne Hoover SBN #282018
choover@mcguirewoods.com
Aaron R. Marienthal SBN #273154
amarienthal@mcguirewoods.com
Two Embarcadero Center
Suite 1300
San Francisco, CA 94111-3821
Telephone: 415.844.9944
Facsimile: 415.844.9922

Attorneys for Defendant Wells Fargo Bank, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANNIE CHANG, TIGER CHANG
INVESTMENTS, LLC, ASIANS
INVESTING IN REAL ESTATE, LLC,
MELANIE GONZALES, GARY
GONZALES, and G&M YOU-NIQUES
PROPERTY LLC, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.,

Defendant.

CASE NO. 4:19-cv-01973-HSG

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND AND BRIEFING
SCHEDULE ON MOTION TO DISMISS
PURSUANT TO L.R. 6-1 AND ORDER**

Complaint Filed: April 12, 2019
Current Response Date: May 9, 2019
New Response Date: June 10, 2019

Honorable Haywood S. Gilliam Jr.

Plaintiffs Annie Chang, Tiger Chang Investments, LLC, Asians Investing in Real Estate, LLC, Melanie Gonzales, Gary Gonzales, and G&M You-Niques Property LLC (collectively, “Plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”), and by and through their counsel of record, hereby stipulate as follows:

1. WHEREAS, the initial Complaint in this matter was filed on April 12, 2019, in the United State District Court, Northern District of California (Dkt. 1).

2. WHEREAS, this case has been assigned to Judge Haywood S. Gilliam, Jr. (Dkt. 15).

1 3. WHEREAS, on April 18, 2019, Wells Fargo was served with the Summons and
2 Complaint (Dkt. 21).

3 4. WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), Wells Fargo's
4 responsive pleading is due twenty-one (21) days after being served with the summons and
5 complaint, or May 9, 2019.

6 5. WHEREAS, the Parties met and conferred on May 3, 2019 and have agreed to the
7 following briefing schedule with respect to Wells Fargo's anticipated Motion to Dismiss:

Date	Pleading
June 10, 2019	Wells Fargo's Motion to Dismiss to be filed
July 10, 2019	Plaintiffs' Opposition Deadline
July 25, 2019	Wells Fargo's Reply Deadline

13
14 6. WHEREAS, extending the foregoing deadlines will not impact any other deadlines
15 in this case.

16 7. WHEREAS, the parties have not previously requested that any other deadlines be
17 extended.

18 WHEREFORE, the Parties hereby agree that the time for Wells Fargo to respond to the
19 Complaint is extended to June 10, 2019, Plaintiffs' deadline to file an Opposition to Wells Fargo's
20 Motion to Dismiss is July 10, 2019 and Wells Fargo's deadline to file a Reply is July 25, 2019.

21
22 DATED: May 7, 2019

MCGUIREWOODS LLP

23
24 By: /s/ Carolee A. Hoover
25 Carolee A. Hoover
26 Attorneys for Defendant WELLS FARGO
27 BANK, N.A.
28

//

//

1 DATED: May 7, 2019

GOLMAN SCARLATO & PENNY P.C.

2
3 By: /s/ Mark S. Goldman
Mark S. Goldman

4 Mark S. Goldman (Pro Hac Vice)
5 Paul J. Scarlato (Pro Hac Vice)
6 Attorneys for Plaintiffs

7 8 Tower Bridge, Suite 1025
8 161 Washington Street
9 Conshohocken, PA 19428
10 Telephone (484)342-0700
goldman@lawgsp.com
Scalato@lawgsp.com

11 Eve H. Cervantez
12 ALTSHULER BERZON LLP
13 117 Post Street, Suite 300
14 San Francisco, CA 94108
Tel: (415) 421-7151
Facsimile: (415) 362-8064

15 Alan L. Rosca (Pro Hac Vice)
16 GOLMAN SCARLATO & PENNEY P.C.
17 23250 Chagrin Blvd., Suite 100
18 Beachwood, OH 44122
Telephone: (484)342-0700
rosca@lawgsp.com

19 Jonathan Garner (Pro Hac Vice)
20 Alfred L. Fatale III (Pro Hac Vice)
21 Ross M. Kamhi (Pro Hac Vice)
22 LABATON SUCHAROW LLP
23 140 Broadway
24 New York, NY 10005
25 Telephone: (212) 907-0700
26 Facsimile (212) 818-0477
27 jgardner@labaton.com
28 afatale@labaton.com
rkamhi@labaton.com

1 I attest that all signatories listed above, and on whose behalf this Stipulation is submitted,
2 have concurred in and authorized the filing of the Stipulation.

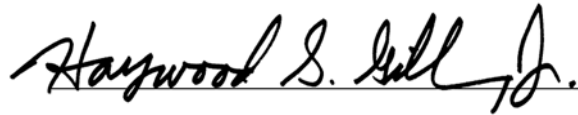
3
4 /s/ Carolee A. Hoover

Carolee A. Hoover

ORDER

Pursuant to the Joint Stipulation Regarding Extension to Respond and Briefing Schedule on Motion to Dismiss Pursuant to L.R. 6-1 filed by the parties, and for good cause, **IT IS SO ORDERED.**

Dated: May 8, 2019

A handwritten signature in black ink, reading "Haywood S. Hall Jr.", written over a horizontal line.

United States District Judge